

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

DONNA CURLING, et al;)	
)	
Plaintiffs,)	
)	
v.)	CIVIL ACTION
)	FILE NO: 1:17cv02989-AT
BRIAN P. KEMP, et al.;)	
)	
)	
Defendants.)	
)	

**AFFIDAVIT OF DWIGHT BROWER IN SUPPORT OF FULTON
COUNTY DEFENDANTS' RESPONSE TO PLAINTIFF'S MOTION FOR
LIMITED AND EXPEDITED DISCOVERY**

Dwight Brower, who appeared before the undersigned notary public duly authorized to administer oaths in this state and after being sworn, deposes and says as follows:

1.

I am Dwight Brower. I am more than 21 years old and I am under no legal disability which would prevent me from giving this affidavit. I am giving this

affidavit based on my own personal knowledge as Fulton County Chief of Elections. This affidavit is made for use as evidence in the above-styled case.

2.

Direct Recording Electronic (“DRE”) voting machines are the state-required method of voting in Fulton County, Georgia.

3.

DRE machines were used for voting during the April 18, 2017 election for the Sixth Congressional District.

4.

DRE machines were used for voting during the June 20, 2017 run-off for the Sixth Congressional District.

5.

I am aware that Plaintiffs’ Attorney Bryan Ward has asked for Fulton County to maintain a hold on the voting machines and GEMS server used in the June 20 and April 18 elections.

6.

Preparations are underway for several elections in Fulton County on November 7, 2017.

7.

It is currently anticipated that 2270 DRE machines are needed to conduct the November 7, 2017 Fulton County elections.

8.

Fulton County is currently maintaining a hold on 1324 DRE machines and currently has 1862 machines available for use.

9.

If Fulton County is required to maintain a litigation hold on all 1324 used in the April 18, 2017 and June 20, 2017 elections, Fulton County will have a shortfall of 408 DRE machines and will not have enough DREs to hold its elections in November.

10.

The DRE machines currently in use in Fulton County are no longer available from the manufacturer. As such, no more machines can be purchased. Compliance with this hold request is causing a hardship on Fulton County.

FURTHER AFFIANT SAYETH NOT.

Executed in Fulton County, Georgia this 21st day of August, 2017.

DWIGHT BROWER
Chief of Elections, Fulton County

SWORN to and subscribed
before me this_____ day
of August, 2017.

Notary Public

My Commission Expires:_____